Northeast Maryland Waste Disposal Authority

February 13, 2004

U.S. Department of Energy
Via E-mail

RE: Revised General Guidelines for the Reporting of Greenhouse Gas Emissions and Emission Reductions Under Section 1605(b) of the National Energy Policy Act.

Dear Sir or Madam:

On behalf of the Northeast Maryland Waste Disposal Authority (the "Authority"), I wish to offer the following comments in response to the above-referenced U.S. Department of Energy General Guidelines for Reporting of Greenhouse Gas Emissions. We are troubled by the proposed Guidelines issued by the U.S. Department of Energy that appear to disavow any method that would account for the significant, quantifiable avoided emissions resulting from the technologies selected by our member jurisdictions and many of our nation's cities to manage its municipal solid waste. In particular, we urge DOE to account for the benefits of waste-to-energy technology. Our decision to use waste-to-energy as a solid waste management method has resulted in tangible savings in greenhouse gas emissions that otherwise would be emitted into our atmosphere. The failure by the U.S. DOE to account for waste-to-energy ignores reality, and the significant advancements attributable to decisions made by our member jurisdictions towards halting global climate change.

Waste-to-energy offers two important benefits to America's cities – environmentally safe solid waste management and disposal, as well as the generation of clean electric power. Waste-to-energy facilities produce clean, renewable energy through the combustion of municipal solid waste in specially designed power plants equipped with the most modern pollution control equipment to clean emissions.

The growing use of waste-to-energy as a method to dispose of trash and generate power has greatly reduced environmental impacts of municipal solid waste management, including emissions of greenhouse gases. For example, an analysis prepared for the U.S. Conference of Mayors by the U.S. Environmental Protection Agency, entitled *The Impact of Municipal Solid Waste Management on Greenhouse Gas Emissions in the United States,"* documents that significant contribution made by waste-to-energy in reducing the amount of greenhouse gases that otherwise would be released into our atmosphere in the absence of the technology. Waste-to-energy technology reduces more than forty million metric tons of greenhouse gases in the form of carbon dioxide equivalents that otherwise would be released into the atmosphere on an annual basis, according to this analysis developed by the U.S. Environmental Protection Agency and the Integrated Waste Services Association (IWSA) using EPA's Decision Support Tool program.

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America's waste-to-energy facilities dispose of trash, and are an alternative to land disposal that releases methane – a potent greenhouse gas – as trash decomposes. Waste-to-energy also produces electricity, lessening reliance on fossil fuel power plants that release carbon dioxide, another greenhouse gas, into the atmosphere when coal is burned. Operation of waste-to-energy plants avoid the release of methane that otherwise would be emitted when trash decomposes, and the release of CO2 that would be emitted from generating electricity from fossil fuels.

Waste-to-energy's benefits are quantifiable. A recent study of the Saugus, Massachusetts, facility included site specific and verifiable information regarding alternative landfill disposal, plant emissions, trash composition and other plant-specific data. This information that was analyzed using the EPA Decision Support Tool computer modeling to determine that about 73,000 metric tons of carbon dioxide equivalent emissions are avoided annually because of one plant's operations. Accounting for the three waste-to-energy facilities in our area would result in an even more equally impressive contribution to solving the climate change problem.

It is essential that DOE address the importance of technologies such as waste-to-energy, and the facilities' contribution to reducing greenhouse gas emissions that otherwise would result from the unavoidable need to dispose of trash. If cities close their waste-to-energy facilities tomorrow, millions of tons of greenhouse gases would be released into the atmosphere that otherwise would be safely avoided.

The proposed DOE 1605(b) approach is incorrect because it refuses to admit that greenhouse gas reductions from waste-to-energy operations may be realized within the context of overall solid waste management practices. If not waste-to-energy, then increased greenhouse gas emissions. It is as simple as that.

The nation's cities urge DOE to take credit for waste-to-energy reductions, and further urge DOE's acceptance of the EPA life-cycle approach and the underlying computer model used to calculate reductions. For more information, I would suggest contact Susan Thorneloe at U.S. EPA Air Pollution Prevention and Control Division, Office of Research and Development in Research Triangle Park, North Carolina. (919) 541- 2709.

Finally, the "Authority" strongly believes that credits should be owned by the entity owning a waste-to-energy facility. We urge DOE to accept this recommendation. More than half of America's waste-to-energy facilities are owned by municipalities. Local public officials have made difficult political decisions in the selection of proper solid waste management technologies. The resulting benefits – including greenhouse gas credits – should accrue to the communities that own a facility. Similarly, private operators developed waste-to-energy plants taking on significant risk and should be offered the reward of operating clean, efficient plants.

We oppose assignment of greenhouse gas credits to either the supplier of trash or the purchaser of electricity.

Thank you for consideration of our views. We look forward to working the U.S. DOE on this very important issue.

Sincerely,

Robin B. Davidov

Robin B. Davidov
Executive Director

cc: Maria Zannes, IWSA
Judy Sheahan, U.S. Conference of Mayors

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